

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)	CRIMINAL NO. 16-10300
)	
UNITED STATES OF AMERICA)	COUNTS ONE and TWO:
)	Coercion and Enticement
v.)	of a Minor
)	18 U.S.C. § 2422(b)
)	
)	COUNTS THREE and FOUR:
CURTIS SIMONEAU,)	Sexual Exploitation of Children, and
)	Attempt
)	18 U.S.C. § 2251(a) and (e)
)	
Defendant.)	COUNT FIVE:
)	Possession of Child Pornography
)	18 U.S.C. §2252A(a)(5)(B)
)	
)	Forfeiture Allegations
)	18 U.S.C. §§ 2253 and 2428

INDICTMENT

COUNT ONE: **18 U.S.C. § 2422(b)**
Coercion and Enticement of a Minor

The Grand Jury charges that:

Between on or about December 1, 2015 and March 31, 2016, within the District of
Massachusetts, and elsewhere,

CURTIS SIMONEAU,

defendant herein, did use a facility and means of interstate and foreign commerce, to wit, the
Internet and an interstate telephone carrier, to knowingly persuade, induce, entice and coerce an
individual who had not attained the age of 18 years, "Minor A," to engage in sexual activity for
which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT TWO: **18 U.S.C. § 2422(b)**
Coercion and Enticement of a Minor

The Grand Jury further charges that:

Between on or about December 1, 2015 and March 31, 2016, within the District of
Massachusetts, and elsewhere,

CURTIS SIMONEAU,

defendant herein, did use a facility and means of interstate and foreign commerce, to wit, the
Internet and an interstate telephone carrier, to knowingly persuade, induce, entice and coerce an
individual who had not attained the age of 18 years, “Minor B,” to engage in sexual activity for
which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT THREE: 18 U.S.C. §§ 2251(a) and (e)
Sexual Exploitation of Children

The Grand Jury further charges that:

Between on or about December 1, 2015 and March 31, 2016, in the District of Massachusetts and elsewhere,

CURTIS SIMONEAU,

defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, "Minor A," to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FOUR: 18 U.S.C. §§ 2251(a) and (e)
Sexual Exploitation of Children

The Grand Jury further charges:

Between on or about December 1, 2016 and March 31, 2016, within the District of Massachusetts and elsewhere,

CURTIS SIMONEAU,

defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, "Minor B," to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FIVE: **18 U.S.C. §2252A(a)(5)(B) and (b)(2)**
Possession Of Child Pornography

The Grand Jury further charges:

On or about August 4, 2016, in the District of Massachusetts,

CURTIS SIMONEAU,

defendant herein, did knowingly possess material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor or a minor who had not attained 12 years of age, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

COERCION AND ENTICEMENT OF A MINOR FORFEITURE ALLEGATION
(18 U.S.C. § 2428)

The Grand Jury further charges that:

1. The allegations of Counts One and Two of this Indictment are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2428.

2. Upon conviction of one or more offenses in violation of 18 U.S.C. § 2422(b), as set forth in Counts One and Two of this Indictment,

CURTIS SIMONEAU,

defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 2428, all of his right, title, and interest in any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violation; and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to, items seized by law enforcement on or about August 4, 2016, from the defendant's residence in Framingham, Massachusetts.

3. If any of the property described in Paragraph 2, as a result of any act or omission of the defendant -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

it is the intention of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 2.

All pursuant to Title 18, United States Code, Section 2428.

SEXUAL EXPLOITATION OF CHILDREN FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The Grand Jury further charges that:

1. The allegations of Counts Three, Four, and Five of this Indictment are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253.

2. Upon conviction of one or more offenses in violation of 18 U.S.C. §§ 2251(a) & (e) or of 18 U.S.C. § 2252A, as set forth in Counts Three through Five of this Indictment,

CURTIS SIMONEAU,

defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property. The property to be forfeited includes, but is not limited to, items seized by law enforcement on August 4, 2016, from the defendant's residence in Framingham, Massachusetts.

3. If any of the property described in Paragraph 2, as a result of any act or omission of the defendant -

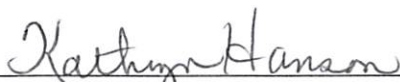
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty, it is the intention of the United States, pursuant to 18 U.S.C. § 2253(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 2.

All pursuant to Title 18, United States Code, Section 2253.


A TRUE BILL


Foreperson of the Grand Jury


DAVID G. TOBIN
Assistant United States Attorney

District of Massachusetts; October 6, 2016

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk
10/6/16 12:35PM